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VIA ECF

Honorable Vincent L. Briccetti
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: *Martinez, et al v. Paramount Country Club, LLC*
Our File No.: **16541.00185**
Docket No.: **7:18-cv-04668 (VB) (JCM)**

Dear Judge Briccetti:

We represent the defendant Paramount Country Club, LLC ("PCC") in the above-referenced matter. We write pursuant to Your Honor's Individual Rule 1.B, to request that two of PCC's witnesses for the upcoming September 12, 2019 bench trial be permitted to testify via video-conference. PCC plans to call Taryn Caban and Crystle Smith to testify, and they reside in North Carolina and Florida, respectively. Below are their full addresses:

Taryn Caban
11111 Carmel Commons Blvd
Ste 320
Charlotte, NC 28226

Crystle Smith
2054 Vista Parkway, Suite 300
West Palm Beach, FL 33411

Both witnesses are necessary to PCC's case and it would be an undue hardship on these witnesses to travel to New York to testify. PCC has already exchanged these witnesses with Plaintiffs' counsel, and having these witnesses testify through video-conference as opposed to in-person testimony will not prejudice Plaintiffs. We have reached out to Plaintiffs' counsel for their consent, but have not heard back yet as Mr. Katz is out of the office this week. In the interest of time and potential travel arrangements, we request this allowance ahead of said consent. We thank the Court for its time and attention to this matter.

Respectfully submitted,

WILSON ELSE MOSKOWITZ EDELMAN & DICKER LLP

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cc: Kenneth Katz, Esq. (*via* ECF)